

Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

JEFFREY I. GREENSTEIN,

Defendant.

No. CR08-0296 RSM

UNOPPOSED MOTION TO
ALLOW DEFENDANT TO
TRAVEL WHILE ON
SUPERVISED RELEASE

NOTE ON MOTION CALENDAR:
May 8, 2015

Defendant Jeffrey I. Greenstein, by and through his attorney Jeffery P. Robinson, respectfully requests that this Court modify the conditions of his Supervised Release to allow him to travel internationally to Italy and Switzerland for business from June 10 through June 17, 2015 and to various ports in Alaska on a Holland America cruise ship for his father-in-law's 95th birthday celebration from June 21 through June 28, 2015, with the permission of his Probation Officer and with such restrictions and conditions as the United States Probation Office may require.

As the Court is aware, Mr. Greenstein pled guilty to two offenses – conspiracy to defraud the United States and aiding and assisting in the filing of a false tax return. After being sentenced to 50 months on January 28, 2011, and serving his prison sentence, Mr.

1 Greenstein is serving his two-year term of Supervised Release. The Court granted Mr.
2 Greenstein's prior request to travel internationally to visit his son who is studying abroad.
3 He successfully complied with all requirements placed upon him by Probation and returned
4 to the United States without incident.

5 Mr. Greenstein now requests permission to take two more trips. The first is travel for
6 his art dealing business Contemporary Art Group, LLC, and its parent company YIS Art,
7 LLC, to Italy for the Venice Biennale, which provides invaluable and unsurpassed
8 opportunities, education, and experience, and to Switzerland for Art Basel, which is the
9 largest art fair in the world with over 300 participating galleries from North America,
10 Europe, Asia, and Latin America and affords a unique opportunity to both buy and sell
11 inventory for his art business. The second is travel on an Alaskan cruise to join his father-in-
12 law who is taking his children and grandchildren (22 people) on a cruise to celebrate his 95th
13 birthday – what might be the last of such celebrations given deteriorating health and
14 advancing age. The ports are all United States cities with the exception of Victoria, Canada.
15 Since day trips from the ship are optional, Mr. Greenstein will remain on-board during this
16 visit given the challenges associated with visiting Canada. See the attached Travel Request
17 Forms / Applications for Travel that Mr. Greenstein submitted to Probation, Exhibits A and
18 B.
19

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21 Counsel for the United States, Assistant U.S. Attorney Katheryn Frierson, does not
22 oppose this motion.
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1 For these reasons, Mr. Greenstein respectfully requests the Court grant him
2 permission to travel to Italy and Switzerland from June 10 through June 17, 2015, and to
3 travel on the Alaskan cruise from June 21 through June 28, 2015.

4 DATED this 1st day of May, 2015.

5 Respectfully submitted,

6 SCHROETER, GOLDMARK & BENDER

7 s/ Jeffery P. Robinson

8 JEFFERY P. ROBINSON

9 Email: robinson@sgb-law.com

10 *Counsel for Defendant Jeffrey Greenstein*

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15
16 CERTIFICATE OF SERVICE

17 I hereby certify that on May 1, 2015, I electronically filed the foregoing with the
18 Clerk of the Court using the CM/ECF system, which will send notification of such filing to
19 Katheryn Frierson and Michael Dion, Assistant United States Attorneys. I also emailed a
20 copy to the United States Probation Officer.

21
22 s/ Andrea Crabtree

23 ANDREA CRABTREE

24 Paralegal

25 SCHROETER GOLDMARK & BENDER

26 Email: crabtree@sgb-law.com

EXHIBIT A

THIS FORM IS TO BE SUBMITTED AT LEAST 2 WEEKS PRIOR TO PROPOSED TRAVEL DATE TO: *PARK*

(Officer Name)

TRAVEL REQUEST FORM/APPLICATION FOR TRAVEL

Date: 4/27/15	Phone No: (206) 310-8018
Name: Jeff Greenstein	Departure Date: 6/10/15
Address: 9772 SE 35th Place	Return Date: 6/17/15
City: Mercer Island State: WA Zip: 98040	
Purpose of Trip: Business	
Persons Traveling With (Name & Address) Wife Judith	
Persons to Visit (Name, Address, & Phone No.) or Place of Destination: Venice, Italy and Basel/Zurich, Switzerland	
Accommodations (will be verified); Name, Address, Area Code & Phone No: Venice - Aman Grand Canal Calle Tiepolo 1364 Sestiere San Polo, Venezia, Italy 39 0412 707333 Zurich - Widder Hotel Rennweg 7 Zurich, SW 41 44 224 2526	
Mode of Transportation	
Vehicle	Airline (Attach copy of ticket or itinerary)
Year, Make & Model:	Name of Airline: Private outbound/British Airways Return
Color:	Departure Flight No. & Time: Private 4pm on 6/10
License No:	State of Issuance:
Return Flight No. & Time: BA 713/BA49 6/17 @3:30	
Owner of Vehicle:	
Other mode of Transportation (specify): private flight from Venice to Basel	
Fine/Rest/Dependent support payment \$ 0.00 /mo. Current: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Approximate costs (travel, lodging, meals): \$ 50,000.00	
Signature: <i>[Signature]</i>	

Mode of Transportation**Vehicle****Airline** (Attach copy of ticket or itinerary)

Year, Make & Model:

Name of Airline: Private outbound/British Airways Return

Color:

Departure Flight No. & Time: Private 4pm on 6/10

License No:

State of Issuance:

Return Flight No. & Time: BA 713/BA49 6/17 @3:30

Owner of Vehicle:

Other mode of Transportation (specify): private flight from Venice to Basel

Fine/Rest/Dependent support payment \$ 0.00 /mo. Current: ☐ Yes ☒ No

Approximate costs (travel, lodging, meals): \$ 50,000.00

Signature:

TO BE COMPLETED BY PROBATION OFFICER

Delinquent Monthly Reports:

Has complied with scheduled appointments:

Approved by Counselor (if applicable):

Fine/Rest/Dependent support payments current: Balance \$ _____ Monthly Payments: \$ _____

Fully complied with previous travel requirements: ☐ Yes ☐ NoAdvance approval and/or contact with District to be visited required: ☐ Yes ☐ NoAny positive UAs during last 6 months? ☐ Yes ☐ NoAny other violations during last 6 months? ☐ Yes ☐ No

Probation Officer Signature: _____

Comments

Travel Details

Wednesday 17 Jun 15

Other Information

CITIZENS OF UNITED STATES MUST CARRY A VALID PASSPORT

Travel Details

Tuesday 16 Jun 15

Hotel Information

Hotel	WIDDER HOTEL	Confirmed	
Address	Rennweg 7	Stay	1 Night/s
	ZURICH CH 8001	Telephone	41-44-2242526
Check In Date	Tue 16 Jun 2015	Fax	41-44-2242424
Check Out Date	Wed 17 Jun 2015		
Confirmation Number	84731427		
Special Information	Junior Suite King Bed Room		
Base Rate	CHF 1400.00 / per night, may be subject to local taxes and service charges		
Cancellation Policy	Cancel 01D prior to day of arrival		
Rooms	1 Room		
Guaranteed	For Late Arrival		
Hotel Rate Includes, W Lan, Breakfast And Taxes			

Travel Details

Wednesday 17 Jun 15

Flight Information

Airline Record Locator	6XV8L9	Confirmed	
Airline	British Airways	Estimated Time	1 Hr 55 Mins
Flight	BA713	Equipment	Airbus Industrie A320-100/200
Origin	Zurich, Zurich-Kloten	Meal	Meals
Destination	London, London Heathrow	Number of Stops	Non-stop
Departing	01:10 PM		
Arriving	02:05 PM		
Arrival Terminal	Terminal 5		
Class	D Business Class		
Seats	3D, 3F		

Flight Information

Airline Record Locator	6XV8L9	Confirmed	
Airline	British Airways	Estimated Time	9 Hrs 35 Mins
Flight	BA49	Equipment	Boeing 777-200/300
Origin	London, London Heathrow	Meal	Meals
Destination	Seattle, Seattle-Tacoma International	Number of Stops	Non-stop
Departing	03:30 PM		
Arriving	05:05 PM		
Departure Terminal	Terminal 5		
Class	F First Class		
Seats	2E, 2F		
Thank You For Choosing American Express Travel Services			



AMAN

CANAL GRANDE VENICE

13 Febbraio 2015

Saluti from Aman Canal Grande Venice.

Thank you for your reservation at Aman Canal Grande Venice. We are pleased to confirm your booking as follows:

GUEST NAME : Mr. Jeff & Mrs. Greenstein	REFERENCE NUMBER : 202693
ARRIVAL DATE : 11-06-15	DEPARTURE DATE : 16-06-15
ROOM TYPE : Palazzo Chamber	NUMBER OF GUESTS : 2 Adults
NUMBER OF ROOMS : 1	NUMBER OF NIGHTS : 5
ROOM RATE : EUR 1,750.00	DATE : 13 Febbraio 2015

RATE:

- * Rates are ROOM ONLY and are subject to 10% Vat & Tourist Tax of Euro 5.00 per person per day for up to 5 days. Children below 10 years of age are exempt from the Tourist Tax.
- * One complimentary round trip boat transfer is provided between Marco Polo International Airport or Piazzale Roma/Santa Lucia train station and Aman Canal Grande Venice.
- * Rates, government and local taxes are subject to change without notice.

ANDREW HARPER AMENITIES:

- * Room upgrade to next category upon check-in (subject to availability)
- * Daily Continental breakfast for two (available through restaurant)
- * A unique local experience, once during their stay for up to 2 guests - Sunset aperitivo on the altana with Prosecco & Cichetti
- * One hour massage for two, bases on minimum 3 nights stay


PALAZZO PAPADOPOLI HOTEL & SPA srl
PALAZZO PAPADOPOLI, CALLE TIEPOLO 1364, SESTIERE SAN POLO, VENEZIA 30125, ITALY
TEL: +39 0412 707333 FAX: +39 0412 2707555 WEB www.amanresort.com

EXHIBIT B

THIS FORM IS TO BE SUBMITTED AT LEAST 2 WEEKS PRIOR TO PROPOSED TRAVEL DATE TO: PARK

(Officer Name)

TRAVEL REQUEST FORM/APPLICATION FOR TRAVEL

Date: 4/27/15	Phone No: (206) 310-8018	
Name: Jeff Greenstein	Departure Date: 6/21/15	
Address: 9772 SE 35th Place	Return Date: 6/28/15	
City: Mercer Island	State: WA	Zip: 98040
Purpose of Trip: Personal - Father-in-laws 95th Birthday celebration		
Persons Traveling With (Name & Address) Wife Judith and children Joshua, Aaron, Gailen and Gabriel		
Persons to Visit (Name, Address, & Phone No.) or Place of Destination: Alaska - see ports on attached itinerary		
Accommodations (will be verified); Name, Address, Area Code & Phone No: Holland America Line - Amsterdam Ship		
Mode of Transportation		
Vehicle		Airline (Attach copy of ticket or itinerary)
Year, Make & Model:		Name of Airline:
Color:		Departure Flight No. & Time:
License No:	State of Issuance:	Return Flight No. & Time:
Owner of Vehicle:		
Other mode of Transportation (specify): Cruise Ship - voyage A523		
Fine/Rest/Dependent support payment \$ 0.00 /mo. Current: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Approximate costs (travel, lodging, meals): \$ 15,000.00		
Signature: 		

TO BE COMPLETED BY PROBATION OFFICER	
Delinquent Monthly Reports:	Has complied with scheduled appointments:
Approved by Counselor (if applicable):	
Fine/Rest/Dependent support payments current: Balance \$ _____ Monthly Payments: \$ _____	
Fully complied with previous travel requirements: <input type="checkbox"/> Yes <input type="checkbox"/> No	
Advance approval and/or contact with District to be visited required: <input type="checkbox"/> Yes <input type="checkbox"/> No	
Any positive UAs during last 6 months? <input type="checkbox"/> Yes <input type="checkbox"/> No	Any other violations during last 6 months? <input type="checkbox"/> Yes <input type="checkbox"/> No

Probation Officer Signature: _____

Comments



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GUEST BOOKING CONFIRMATION

YOUR TRAVEL PROFESSIONAL:

AAA TRAVEL AGENCY
Lydia
1745 114th Ave Se
Bellevue, WA 98004-6968
United States
(425) 462-2222

CRUISE CONFIRMATION

Booking #: VRVN9N
Statement Date: Apr 23, 2015
Booking Status: Active

PAYMENT SCHEDULE Currency: U.S. Dollars

Deposit Due: Paid
Final Payment Due Date: Apr 7, 2015

CRUISE DETAILS

Embark Date: Jun 21, 2015
Disembark Date: Jun 28, 2015
Ship: Amsterdam
Voyage: A523
From Port: Seattle
To Port: Seattle

Duration: 7
Category: A
Stateroom: 6177
Bed Requested: Queen Bed
Group Name: Aaa Travel Agenc -L dia
Group ID: TPP
Dining: Confirmed Main, Request Table for 8

GUEST INFORMATION

	Guest 1	Guest 2
Name:	Mr. Jeffrey Israel Greenstein	Mrs. Judith Ellen Greenstein
Mariner ID:	★ 103254959	★ 102204898
Air:	Not Purchased	Not Purchased
Cancellation Plan:	Not Purchased	Not Purchased
Ship Occupancy:	Double	Double
Home City:	SEA	SEA
Onboard Credit (USD):	\$175.00	\$175.00

PRICING BREAKDOWN Currency: U.S. Dollars

	Guest 1	Guest 2	Total
Booking Total:	\$2,429.13	\$2,429.13	\$4,858.26
Cruise/Journey Fare	\$2,199.00	\$2,199.00	\$4,398.00
Est'd Taxes, Fees & Port Expenses	\$230.13	\$230.13	\$460.26
Booking Total:	\$2,429.13	\$2,429.13	\$4,858.26
Amount Received:			\$4,858.26
Total Due:			\$0.00



GUEST BOOKING CONFIRMATION

Booking #: VRRVN9N
Statement Date: Apr 23, 2015

VALUE-ADDED ITEMS

Guest 1	Guest 2
Promotional \$50 Soda Card	Promotional \$50 Soda Card
Navigator Wine Pkg (3 Bottle) Promo	Shore Ex Discount, Book By April 15
Shore Ex Discount, Book By April 15	

CANCELLATION FEES SCHEDULE

Cancellation Fees Begin	Cancellation Fees (Per Person)
Apr 7, 2015	\$175.00 (Amount Forfeited)
Apr 26, 2015	50% Gross Fare
May 24, 2015	75% Gross Fare
Jun 6, 2015	100% Gross Fare

CANCELLATION PROTECTION PLAN (CPP)

Prepare for the unexpected - cancel for any reason

Holland America Line's CPP protects your vacation investment. CPP Standard allows you to cancel your vacation up to 24 hours before your Holland America Line trip, for any reason, and receive a money back refund of 80% of eligible amounts paid. CPP Platinum provides enhanced cancellation protection as well as insurance coverage.

IMPORTANT NOTICES:

All Holland America Line guests travel under the terms and conditions of the Cruise Contract that will be issued to you and which may be provided upon request or viewed on our website: www.hollandamerica.com. Please read the contract carefully as it affects our legal rights. If you have booked your air travel through Holland America Line, please review the Important Flight Notices provided after the itinerary below. Holland America Line reserves the right not to honor any published prices that it determines were erroneous due to printing, electronic, or clerical error.

1. The Standard and Platinum Cancellation Protection Plans (CPP or CPPP) are optional and are available for purchase prior to the date on which cancellation fees begin to accrue. Payment is due at time of purchase and is non-refundable.
2. Each country has its own entry requirements, and guests are personally responsible to have the necessary documents when boarding. Holland America Line highly recommends that all guests carry a passport that is valid for at least six months beyond the completion date of your travel, proof of required immunizations & visa(s) and proof of eligibility to enter Canada (for applicable itineraries). Guests traveling on any Yukon Land+Sea Journey which includes a flight between Dawson City, Yukon, Canada and Fairbanks, Alaska, USA are required to have a valid passport in order to clear immigration and customs for entry at the airport.
3. Changes to or cancellation of Air, Hotel Packages or Ground Transportation are subject to the above cancellation fees.
4. For security reasons, first, middle (if applicable) and last names must match the government issued ID used for boarding.
5. All guests are encouraged to complete our online check-in process to facilitate compliance with U.S. regulations and avoid the risk of significant departure delays.
6. Holland America Line reserves the right to substitute hotels of similar category.
7. Our smoking policy has been updated to reflect our continuing commitment to the comfort of all of our guests. Stateroom interiors continue to be non-smoking. Any guest who smokes inside staterooms in violation of the policy will be charged \$250.00 cleaning fee per day of violation. While smoking is not permitted in staterooms, guests are allowed to smoke on stateroom verandahs and other designated, outside decks. Designated smoking areas for all ships are stateroom verandahs, the Casino (for active players only), the Seaview Bar, and the Sports Deck. Guests on the ms Prinsendam, ms Eurodam, ms Nieuw Amsterdam, ms Noordam, ms Oosterdam, ms Westerdam and ms Zuiderdam may also smoke on the Observation Deck. Cigar and pipe smoking is permitted only on designated outside decks and stateroom verandahs. For more detailed information, please visit us at www.hollandamerica.com.



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GUEST BOOKING CONFIRMATION

Booking #: VRVN9N
Statement Date: Oct 22, 2014

ITINERARY

The crew of the **ms Amsterdam** eagerly awaits your arrival on **Jun 21, 2015** for your **7-Day Roundtrip Seattle**. Below are your day-by-day itinerary details - we look forward to seeing you on board soon!

Visit www.hollandamerica.com today to book spa appointments, make dinner reservations and more!

Da	Date	Itinerar	Arrival	Departure
SUN	21JUN15	Sail from Seattle, Washington, US		4:00pm
SUN	21JUN15	Puget Sound ¹		
MON	22JUN15	Sea Day		
TUE	23JUN15	Scenic Cruising Tracy Arm ¹	2:00pm	7:00pm
WED	24JUN15	Juneau, Alaska, US	7:00am	6:00pm
THU	25JUN15	Sitka, Alaska, US ²	8:00am	4:00pm
FRI	26JUN15	Ketchikan, Alaska, US	7:00am	1:00pm
SAT	27JUN15	Victoria, British Columbia, Canada	6:00pm	11:59pm
SUN	28JUN15	Debark Ship Seattle, Washington, US	7:00am	
Legend				
1		Cruising Only		
2		Tender Required		